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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL EDISON,

Defendant.

UNITED STATES OF AMERICA,

Plaintiff,

v.

DEBRA EDISON,

Defendant.

No. CR 07-0074 WHA

DECLARATION OF MANDY BRITTON
IN SUPPORT OF UNITED STATES'
OPPOSITION TO DEFENDANTS'
MOTIONS TO QUASH SUBPOENA

Date: January 15, 2008

Time: 2:00 p.m.

Court: Hon. William H. Alsup

No. CR 07-0479 WHA

Britton Declaration

CR 07-0074 WHA & CR 07-0479 WHA

1 I, Mandy Britton, state and declare as follows:

- 2 1. I am employed as a Special Agent with the Federal Bureau of Investigation and
3 am the lead agent assigned to the investigation of Michael and Debra Edison.
- 4 2. On or about April 3, 2007, I was informed by the Alameda County Sheriff's
5 Office that they had intercepted a letter from the defendant, Michael Edison, who
6 was an inmate in their facility at that time. They provided me with a copy of the
7 letter and a true and correct copy of that letter is attached hereto as Exhibit A.
- 8 3. On June 8, 2007, the Assistant United States Attorney assigned to this
9 investigation, Jeffrey Finigan, and I spoke with Michael Edison's counsel at that
10 time, Michael Thorman. Mr. Thorman advised us that he was in possession of
11 documents he obtained from Debra Edison that purportedly showed the victim in
12 this investigation loaned money to Michael Edison. Mr. Thorman advised us that
13 he would send copies of the documents to Mr. Finigan. Mr. Finigan thereafter
14 advised me that he received a letter dated June 21, 2007, from Mr. Thorman with
15 copies of the aforementioned documents enclosed. Mr. Finigan provided me with
16 a copy of the June 21st letter and its contents and a true and correct copy of the
17 letter and contents are attached hereto as Exhibit B.
- 18 4. On December 18, 2007, AUSA Finigan and I interviewed Mr. Thorman. Mr.
19 Thorman stated that he had a fee agreement with Michael Edison only and that he
20 never considered Debra Edison to be his client. Mr. Thorman also stated that he
21 never advised or instructed Debra Edison to create any documents. He only asked
22 her to send documents that allegedly already existed at the time he dealt with her.

23
24 I declare under penalty of perjury the foregoing is true and correct to the best of my
25 knowledge. Executed on December 28, 2007, in San Francisco, California.

26
27
28 
MANDY BRITTON

Britton Declaration

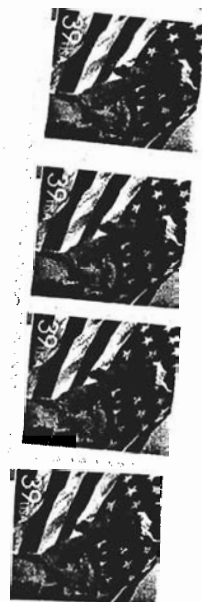
CR 07-0074 WHA & CR 07-0479 WHA

EXHIBIT A

Michael J. Edison U.S.-044
5325 BRODER BLVD.
DUBLIN, CA 94568

Via: Airmail

MRS. DEBRA MEGUM EDISON
82 BUCHENSTRASSE
8050 ZURICH
SWITZERLAND



Handwritten signature or initials.

 THIS ENVELOPE IS RECYCLABLE AND MADE
WITH 30% POST CONSUMER CONTENT.

①

READ AND DESTROY

Debra,

This letter is the "most important thing I have ever asked you to do"

1. No matter what happens you "must stay in Switzerland until we can determine that it is safe for you to return. Just Remember.

a) They cannot make you testify for or against me.

b) If these issues are typed of someone or other demand for documents they cannot "extradite" you from there in any way.

c. We "must" manage the release of the documents that are in the black suit cases - some need to be destroyed and other worked on. (more on this letter)

d) Switzerland to the lesser extent will protect you from all of this you "must not return to the US" until it is safe to do so no matter what the cause.

As this thing heats up we must be careful not to talk about this on the phone in

ME006981

want to give to my children that you keep bugging me about. This "must" not ever be brought up again "as it for now appears that they have missed this all together in their search" However if we use it in "any" way or touch is in any form it will give them the right to take it and it alone will make their case and cause further problem for you. We just must make due with what we have and can raise on our own "No matter what the pain" I never want us to discuss it ever again "for now at least" It's important for your safety as it is the only thing that takes this over the top from a defense point of view. I know you understand.

II Communication:

1. Be Carefull on the phone with me a ~~Speak~~ only about the loans or general business I am trying to negotiate for my bail.
2. If and when we have some money to make bail we must make sure that all paperwork show a Personal loan in my favor as the Court is looking "Very Hard at the Source of any funding or assets of mine that they can Seize"
3. The good news is that we are safe on that front but because of the Swiss Secrecy laws. They might wrongly believe that we are hiding something and it

(3)

will drive them crazy as they keeps looking for those "Hidden Assets". Remember the Swiss will protect you and any assets. Keep every care to protect Carnies Accounts. very private and european based. Any transfer when and if we can find this account should either be in cash or if lawyer direct to a lawyers account then on to its intended location. As soon as ~~we~~ we locate and find that account you will have money to pay a Swiss lawyer (Personal) Carnie is the only one you can talk to about the selection of this attorney. He will be very discrete you can tell her that you need a very trust worth private attorney to help you with some private legal matter and can she give you a Referral of someone she trust. You must not involve KPMG, Brent or any one else. in this selection. When we have some money this Retain should not exceed 10,000 Swiss franks and 300 to 400 SF per hour. You can then use a transfer from Carnies account to the lawyers client acct. Then he on your or my behalf make the US Based transfers or work with our US Attornies etc. This above only applies if we get Money in the account of any amount over 50,000 - 75,000. Any amount over this sum that we get must go to that account then back thru the route

(4)

above. This is important so that you don't create any tax or other sources of the money issue as they might some day relate to the current "US Problem"

In Summary Use the Credit Swiss account freely for the following US Based transfer

- 1.) Payment to our attorneys
- 2.) Any "European Payment"
- 3.) Don't ever keep more than 30-40,000 SF in that account.

~~Q~~

USE THE HSBC ACCOUNTS AS FOLLOWS:

US Accounts for Edison & Co

Your Account Keep depositing any US checks we receive in the name of Edison & Co to that account then transfer as you need to your HSBC account and use for credit card purchase in the "US only"

Don't use it in Europe

~~Q~~ Use the fax the way we did the last time that bears my signature to Faouzi to make and transfer you need. Don't you directly touch any of these US accounts. All transfer must bear my order and facsimile signature for your protection. Remember these accounts are under intense scrutiny for now.

When we get some time you must write
 "ABUCCST Trust Co IN THE British
 Virgin Islands and find out what
 the amount of Back fees we owed and
 what is entailed with getting it paid
 up to date. So we can get a good standing
 letter from them for Cennies Bond and
 being Sandy Rock Investment ~~Back~~ inc
 up to date. You should write the letter
 your self with my signature and the
 Swiss address - Michael J. Edison
 Manager
 Sandy Rock Investments
 Snow Europe
 69 Sternstrasse get address
 Zurich

~~Have Spent \$100,000~~ With my signature on the
 letter.

This only needs to be done when we have some money
 to protect in Cennies Bonds. What this we
 can do business in the future.

What we are getting ready for is a "Ground
 Zero" deal in which we exit "all other
 Companies and Accounts Place all our
 future dealing and business thru either
 Sandy Rock or our Swiss lawyer using
 the Credit Swiss accounts a household
 cost with no more than 100-120k per year
 going thru it.

Records:

We are very shortly have to start shipping Record on a "very" selected basis to our lawyer ~~and~~ We must gain control of these in Switzerland with you. "If you are questioned about any document we are not Ready to Release just tell them they ~~are~~ must be with the stuff of Pome that was shipped directly to the Virgin Islands and are in warehouse storage with the customs agent transfer agent. We need to track this down. Because they may want to go there and search the Record" let them knock themselves out. It will keep them from looking elsewhere while we get them to Switzerland.

Now: IMPORTANT DO RIGHT AWAY

The Record Storage place in New Jersey that we sent all the Records to from the Capt. You have their name These boxes are divided into three categories

1. Odd Shaped Boxes unopened from Vivian Intellectual in Fla. They contain Radio that we can sell sometime "But for how we have them" - 4-6 I think -

2. The second set of Boxes are Regular Normal Standard File Boxes most contain the "Don Johnson Files" These could be kept and shipped directly to our attorney when they ask or if its not too much money have them sent directly to you at the office address Inver Europe, My attention don't send and directly to the house address

There are three ~~or~~ ~~four~~ ~~hanger~~ boxes that hold the most important Records personal that we don't want anyone to get.

You can send them slowly But you must get them out of their way

Second Have Epi Ship or call the Storage place your self " He doesn't seem to want to touch this process himself" - Must also get Records he took from the Apartment ~~as~~ along with the Hard Drive from the computer. If Jusen stuff is in some storage you can send it as well. However if it's not there don't work about it. Not the most important stuff is what he removed from the Apartment - Jusen stuff can stay wherever ~~he~~ Epi kept it - I think you send a storage. - When the Russians come to find Records Remember 1st you know it's in the USSR 2nd when the don't find it give up storage where Jusen's records are. If we ever get them back Epi if we did.

* You must ASAP Gain Control of US Army Records ASAP - Actually send everything except the Rudin etc that important - Get Records Epi took from the Apartment - ASAP
LAST CLOSE THE URGIN STORAGE AND HAVE IT ALL SHIPPED TO ZURICH *

Then you can start the all important heavy task of putting the files sorted and in order to send back to our letterman as they don't get what they need when the opo cooking. I must ask you to do this heavy hand task but how well we do this will spell the difference between Jail & Freedom
GET CONTRACT OF THESE RECORDS, ASA.

1) New Jersey 2) EPH: Appt & Hms Prives 3) Williamsburg Record 1 ~~THE~~ ALL THE Rest can be left in place in NY & USU.

You must help me create a note that is missing from the files you love it is the most important document and ill send in via separate over but you must make sure it is created without ~~for~~ any errors.

Very Carefully follow the following Sept. Dont go near or ever talk to anyone about this

~~Steps~~ Steps

- 1.) EITHER TYPE IN NEW TIMES ROMAN FONT ON 9 1/2 x 11" Paper (Do not use the office or any of our computers) go to a totally SEPARATE SERVICE OUT OF THE Yellow Pages Pay someone to type this STAND OVER THEM WHILE THEY DO IT PAY CASH, GET COPY OF DISK (THEN DESTROY) Dont leave them alone with it. It wont take more than 30-40 minutes its only 2- or three pages.
2. When she has a good draft completed ~~now~~ Have her run this 9 1/2 x 11 paper that bears my original signature at the bottom Use the ten pages I am signing in black.

3. When you have a good ~~copy~~ original note with my signature on it - Make sure she gets the note in such a way that text matches when it looks good - Make 3 copies "Destroy the Original" all all notes from puter Desk Receipts for source etc.

ALL WE NEED IS A COPY OF THE NOTE AND THE MEMORANDUM which I sent you earlier. Did you get it? If so tell me that Rosie's had a birthday on the phone when it's done - Then it needs to be put with some other files that we send better to the heroes - Send it with a bunch of other paper and let them find it by themselves - The other important document is the original Power of Attorney which you have. We must get started on this just in case I don't get the money to get out. If I don't get out "You Must Do This For Me"

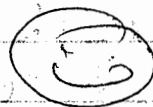
GET ME SOME Paper so that I can sign the Blanks it should be the same as I sign - Send 10 to 15 Pages and I'll send Blanks as well as Signature Pages so you can run some paper. Copies can be on any 9 1/2 x 11" paper that's not important

We need to get this done in the next two weeks as the pressure will begin to mount for its location.

Remember first ~~to~~ tell them you not sure but it must be with the Puma 6 files that were shipped to USVI from Scottsdale. Then when that doesn't work send them to the files in NY. Then we will find them in the other storage place you forgot about in Zurich. Then we can send them the whole file with all the Swiss doc - better note power of attorney etc. Make sure it looks like you didn't sort thru just send in Brown file folder via Fed Express - Don't send until I give you the code word Rosie's Birthday and do we have all the present

Please help me with this. It's the only thing that will allow me to win this thing

I love you so much



Note etc under separate cover

August 1, 2005

Promissary Note

I MICHAEL J. EDISON PROMISE TO PAY
JEAN PHIEGER THE SUM OF TWO MILLION TWO
HUNDRED THOUSAND DOLLARS (\$2,200,000) USD,
INCLUDING ACCRUED INTEREST COMPOUNDED AT
THE RATE OF (8%) EIGHT PERCENT PER ANNUM.

THIS NOTE SHALL BE GOVERNED UNDER THE LAWS
OF THE STATE OF NEW YORK AND MAY BE ASSIGNED,
EXCHANGED OR TRANSFERRED. PRINCIPAL AND ALL
ACRUED INTEREST SHALL BECOME DUE AND PAYABLE
ON OR BEFORE August 1, 2008

By: MICHAEL J. EDISON
NEW YORK, NY



(Make Sure Spelling is Correct Very Important)

(Check Spelling & Grammar)

MEMORANDUM

Dated August 1, 2005

From: Michael J. Edison

To: JEAN PHLEYER

I would like to thank you for your interest in supporting the development stage of my technology investments ^{with} your agreement to provide a loan to support these early stage development projects. This personal loan will allow me to continue to develop the multi stage platform that we have often discussed and should well before its maturity yield good results.

It is my intent and commitment to allow you the following option of exchange. For ~~of~~ your Promissory Note Dated August 1, 2005.

You will be allowed to exchange this note in full for the common stock of any public company that I develop during the time the note is outstanding at the same price as my founder's stock subject to the SEC Rules in force at the time of such exchange.

I again thank you for ^{your} personal commitment and look forward to a long and prosperous future.

I MAY HAVE A BETTER DRAFT - CLEAN UP
SPELLING AND GRAMMAR)

EXHIBIT B

Law Offices Of

BONJOUR, THORMAN, BARAY & BILLINGSLEY

A Professional Corporation
24301 SOUTHLAND DRIVE, SUITE 312
HAYWARD, CALIFORNIA 94545

JULES FREDERICK BONJOUR, JR.
MICHAEL P. THORMAN
CAMELLIA BARAY
DAVID BILLINGSLEY

Telephone
(510) 785-8400
Facsimile
(510) 670-0955

June 21, 2007

via facsimile and U.S. Mail

Mr. Jeffrey Finigan
Assistant United States Attorney
U.S. Department of Justice
Northern District of California
11th Floor, Federal Building
450 Golden Gate Avenue, Box 36055
San Francisco, CA 94102

Re: *U.S. v. Michael J. Edison*
CR 07-0074 WHA

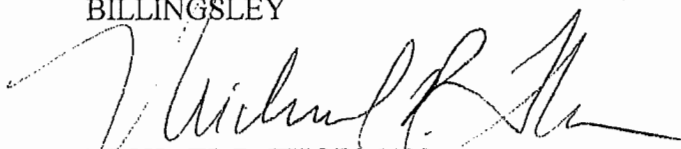
Dear Mr. Finigan:

Enclosed are the two documents I mentioned to you which are appropriately discoverable pursuant to Rule 16(b)(1)(A). Because I have not started a Bates stamp procedure yet, and for the purpose of memorializing this discovery disclosure, the documents are entitled "Summary Memo of Loan Agreement Between Jean Phleger and Michael J. Edison" and "Promissory Note".

I will, of course, provide additional discovery as required as I receive it.

Sincerely yours,

BONJOUR, THORMAN, BARAY &
BILLINGSLEY



MICHAEL P. THORMAN

MPT/df

Enclosures

ME007190

To: Ms. Jean Phleger

From: Mr. Michael J. Edison

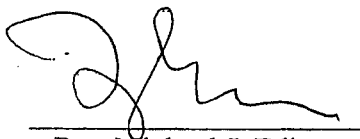
August 2, 2005

Summary Memo of Loan Agreement
Between Jean Phleger and
Michael J. Edison

I very much appreciate the extension of the personal loan evidenced by the attached original Promissory Note dated August 2, 2005. Please take time to review the terms and its conditions.

In addition to the terms of loan which will be due and payable on August 2, 2008 along with 8% accrued interest. I will offer you the right to exchange this note in all or part for the stock of any Public Company which emerges at the same basis as my own. This of course is subject to the Sec Rules at the time for such exchanges. This exchange offer is solely at your discretion.

Thank you again for this loan as it will greatly assist me personally in developing the three development stage companies you have shown an interest in.


By: Michael J. Edison

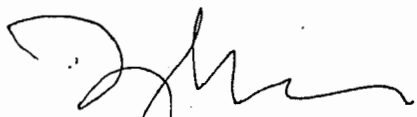
PROMISSORY NOTE

\$2,250,000.00 (USD)

Date: August 1, 2005

On or before August 1, 2008 the undersigned promises to pay Jean Phleger or order, the sum of Two Million Two Hundred Fifty Thousands and no/100 Dollars (\$2,250,000.00) USD with interest from the above date until paid, at the rate of EIGHT (8%) per cent per annum, payable with interest and principal due at maturity, at Las Vegas, Nevada. Interest shall be paid on accrued interest and shall compound monthly.

Should interest not be so paid as indicated above, it shall thereafter bear like interest as the principal at the maximum rate permitted by law. Should default be made in the payment of any interest when due, the whole sum of principal and interest shall become immediately due and payable at the option of the holder of this note. I agree to pay attorney fees to enforce the payment of this note as a court may adjudge reasonable. Principal and interest is payable in lawful money of the United States of America.



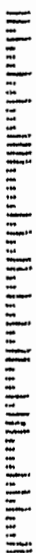
Michael J. Edison

BONJOUR, THORMAN, BARAY & BILLINGSLEY
24301 SOUTHLAND DRIVE, SUITE 312
HAYWARD, CALIFORNIA 94545

Mr. Jeffrey Finigan
U.S. Department of Justice
Northern District of California
11th Floor, Federal Building
450 Golden Gate Avenue, Box 36055
San Francisco, CA 94102



94102+3432



ME007193

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he is an employee of the office of the United States Attorney, Northern District of California and is a person of such age and discretion to be competent to serve papers. The undersigned certifies that he caused copies of

**UNITED STATES' OPPOSITION TO DEFENDANTS' MOTIONS TO QUASH
SUBPOENA and DECLARATION OF MANDY BRITTON IN SUPPORT OF UNITED
STATES' OPPOSITION TO DEFENDANTS' MOTIONS TO QUASH SUBPOENA**

in the cases of U.S. v. MICHAEL EDISON and DEBRA EDISON, No. CR-07-0074 WHA,
No. CR-07-0479 WHA

to be served on the parties in this action, addressed as follows which are the last known
addresses:

Richard Mazer

Law Offices Of Richard B. Mazer
99 Divisadero Street,
San Francisco, CA 94117

Roger William Patton

Patton Wolan Boxer
1814 Franklin Street
Suite 501
Oakland, CA 94612

____ (By Personal Service), I caused such envelope to be delivered by hand to the person or
offices of each addressee(s) above.

____ (By Facsimile), I caused each such document to be sent by Facsimile to the person or
offices of each addressee(s) above.

____ (By Mail), I caused each such envelope, with postage thereon fully prepaid, to be placed
in the United States mail at San Francisco, California.

X (By Fed Ex), I caused each such envelope to be delivered by FED EX to the address
listed above.

I declare under penalty of perjury that the foregoing is true and correct.

December 28, 2007

/s/

WILSON WONG

United States Attorney's Office